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Accelerated Response at NPL Sites Guidance (Superfund Management Review: Recommendation No. 22)

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OSWER Directive No. 9200.2-02

MEMORANDUM

OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

SUBJECT: Accelerated Response at NPL Sites Guidance
(Superfund Management Review: Recommendation No. 22)

FROM: Don R. Clay
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TO: Director, Waste Management Division
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Director, Emergency and Remedial Response Division
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Director, Hazardous Waste Division
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Regions I, VI, VII
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PURPOSE

The purpose of this memorandum is to transmit Agency guidance on accelerating responses at National Priorities List (NPL) sites.

BACKGROUND

Pursuant to the Superfund Management Review, a workgroup was formed to develop guidance to assist the Regions in taking expedited approaches to site cleanups and in making NPL sites "safer." After evaluation of Regional comments, the guidance was split into two separate documents. The attached guidance, the first of the two documents, describes available procedures and contract mechanisms to allow the Regions to take action at NPL sites more quickly under both removal and remedial authority.

IMPLEMENTATION

Specifically, the attached guidance requires that you:

- Ensure that all pre-remedial, removal, remedial, and enforcement staff are familiar with the need to accelerate responses at NPL sites;

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- o Use Superfund removal and remedial authority, as appropriate, to take accelerated actions at those NPL sites where feasible and prudent;
- o Employ enforcement authority promptly at NPL sites to encourage increased PRP involvement in site cleanup;
- o Establish mechanisms to ensure proper coordination and funding of accelerated responses within the Regions; and
- o Promote the operation of Superfund as "one program" through use of elements such as improved interoffice communication and cross-training of Agency personnel.

If you have any questions on this guidance, please contact Hans Crump-Wiesner, Acting Director, Emergency Response Division, at FTS 475-8720, or Scott Maid at FTS 382-4671.

Attachment

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OSWER Directive #9200.2-02

Accelerated Response at National Priorities List Sites[1]

1.0 INTRODUCTION

1.1 Background

In June 1989, the Environmental Protection Agency (EPA) completed a study entitled "A Management Review of the Superfund Program" (Superfund Management Review). This document outlined a new long-term strategy for management of Superfund and described the need for EPA guidance on expediting response at National Priorities List (NPL) sites. The report also emphasized elimination of immediate risk to public health and safety and the minimization of long-term risk from hazardous substances at NPL sites as new measures of program success.

The Superfund Management Review specifically recommended that EPA "take expedited approaches to site cleanup whenever possible" (p. 3-13). The report also emphasized the need for creative or alternative approaches for improving the effectiveness and timeliness of remediation at NPL sites. Recommendations from the Superfund Management Review were further discussed in a September 18, 1989, memorandum from F. Henry Habicht to the Regional Administrators, entitled "Immediate Actions to Implement the Superfund Management Review."

1.2 Purpose

This document focuses on accelerating responses at NPL sites and coordinating available removal, remedial, and enforcement procedures and contract mechanisms in order to accomplish this. This guidance is intended for Regional site managers, including On-Scene Coordinators (OSCs), Site Assessment Managers (SAMs), and Remedial Project Managers (RPMs), enforcement staff, and other Regional and Headquarters Superfund personnel. By implementing these procedures, we may accelerate all types of response actions, and encourage management of NPL sites under "one program."

1.3 Scope

Specifically, this guidance addresses the following areas:

- What is an accelerated response? (Section 2.1)

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[1] The policies and procedures established in this document are intended solely for the guidance of EPA personnel. They are not intended, and cannot be relied upon to create any rights, substantive or procedural, enforceable by any party in litigation with the United States. EPA reserves the right to act at variance with these policies and procedures and to change them at any time without public notice.

- What are the available mechanisms to accelerate responses at NPL sites? (Section 2.2)
- What are the enforcement aspects of accelerated response? (Section 3.0)
- What additional factors should be considered in an accelerated response? (Section 4.0)
- How may the various Superfund program offices work as "one program" to accelerate responses? (Section 5.0)

2.0 ACCELERATED RESPONSE

Accelerated responses may be used in many situations where site managers want to act on sites quickly. Site managers have access to a variety of mechanisms for accelerating responses to threats at NPL sites. In most cases, the tools are modifications of established response options that have been in common use in the Superfund program. Regions should follow the provisions, described below, whenever practicable to expedite cleanups at NPL sites.

2.1 What Is An Accelerated Response?

An accelerated response is an action taken at an NPL site using streamlined response mechanisms, with the purpose of acting quickly to reduce acute risk to human health and the environment. Accelerated responses can help Regions reduce risk from these sites, and can allow for more efficient use of EPA resources.

If evaluation of a site indicates that an accelerated response is warranted, then appropriate action should be taken, by:

- Conducting a removal action in accordance with section 300.65 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP)[2] (proposed NCP section 300.415); or
- Preparing and executing an early action operable unit Record of Decision (ROD) based on existing data or a limited data gathering effort; or

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[2] For ease of use, references to both the old (1985) NCP and the proposed (1988) NCP sections are provided in the text. It is important to note, however, that the 1985 NCP remains in full effect until a revised NCP is promulgated. The revised NCP, which was proposed on December 21, 1988 (53 FR 51394) is expected to be finalized in 1990, at which point the revised section numbers will become effective.

- Implementing techniques to expedite the planning and design process prior to remedial construction.

2.2 What Are The Available Mechanisms?

Removal Actions

Removal actions are used to prevent, abate, minimize, stabilize, or mitigate releases or threats of releases of hazardous substances, pollutants, or contaminants that pose a threat to public health or the environment. Section 300.65 of the NCP (proposed NCP section 300.415) describes factors for determining that a removal action is appropriate (e.g., contamination of drinking water, threat of fire or explosion, potential for migration) and the types of removal actions that are appropriate in certain situations. Removal actions are performed at NPL and non-NPL sites. Approximately 40 removal actions have been conducted annually at NPL sites.

A site manager may, in certain situations, choose to use removal authorities and contracting methods to accelerate response at NPL sites. Actions with a planning period of less than six months are generally (but not always) performed prior to the development of the ROD. If a removal action is indicated at an NPL site, and adequate planning time (i.e., greater than six months) is available before the start of the removal, an engineering evaluation/cost analysis (EE/CA) should be conducted as part of the non-time-critical removal. Alternatively, a remedial investigation/feasibility study (RI/FS) can be conducted. EE/CAs contain evaluations of possible alternative technologies, selection of the response, and document the decisionmaking process. The EE/CA must be made available for public comment as part of the administrative record, in compliance with the public participation procedures for non-time-critical removal actions described in §300.820 of the proposed NCP.

For any category of removal action, the appropriateness of the action is not limited to the factors explicitly described in section 300.65 of the NCP, nor does the NCP limit the responses EPA may take to the examples given in the NCP. Action Memoranda must be completed for all removal actions and must include all information described in the "Superfund Removal Procedures Manual," Chapter III-C.8. Expedited enforcement activities, such as expedited PRP searches and use of model administrative orders, are appropriate for these actions.

Continuation Of Removal Action. As an acute threat at an NPL site is being addressed by a removal action, it may be possible that an incremental expansion in the scope of the removal action would help to further protect human health and the environment and lead to expediting overall cleanup of the site. Regions may determine on a case-by-case basis whether this is appropriate at a site. The following factors should be considered in such case-by-case evaluations:

Scope of Continued Action

- After an acute threat at an NPL site is addressed by a removal action, Regions should consider whether there is any appropriate action that would allow further protection of human health and the environment. This may require employing a removal or remedial action to complete an operable unit. The aim of the accelerated response is to reduce risk to human health and the environment at the site.

Concurrence

- The decision to accelerate response through use of removal authority must be made in consultation with pre-remedial, remedial, removal, and enforcement program managers. The State should also be involved whenever the State is expected to play a role in the action. If the action does not meet removal criteria, however, the accelerated response option chosen must be performed as a remedial action.

- The Region must weigh the loss of cost-share against the need for, and efficiency of, accelerating the response at a site on a case-by-case basis. Regions should attempt to obtain agreement from States on the proposed course of action before proceeding with any accelerated response option.

- If the cleanup will exceed the $2 million statutory limit for a removal action, then Headquarters approval of an emergency or consistency exemption is necessary. If no exemption applies, the accelerated response option chosen must be performed as a remedial action.

- If the removal response will be nationally significant (e.g., involving dioxins or Indian lands), Headquarters concurrence will be necessary. Headquarters concurrence will also be necessary if the action employs innovative or emerging alternative technology.

- The public's interest and concern in the site should be taken into account when deciding what the response should be.

Restrictions

- The State, remedial program, PRP, or other authority must be willing to conduct post-removal site control (PRSC) where needed following a Fund-financed removal action (see section 4.4). The Region may pursue unilateral enforcement action, including judicial action if needed, to obtain PRSC. If arrangements for PRSC cannot be made, the accelerated response must be performed as a remedial action.

- If the action will require extensive, long-term response, such as restoration of a contaminated aquifer, the response should be performed as a remedial action.

Contract Resources

- Regional resources (including resources that may be transferred from the remedial program) must be adequate to meet the requirements for an accelerated removal response at the site without compromising emergency response capability in the Region. If resources for accelerated responses at NPL sites cannot be provided without compromising emergency and time-critical response capabilities in the Region, the accelerated response must be performed and funded as a remedial action.

- An assessment of removal and remedial contract capacity should be performed in order to determine the capacity, availability, and suitability of response contractors to the site in question. Regions must evaluate relative contract capacity before an accelerated response can be continued at the site.

Removal Approaches To Remedial Actions. Remedial action may be conducted using removal contracting methods where the action complies with all removal as well as remedial requirements. In these circumstances, remedial funding is used to implement a ROD at an accelerated rate. Guidance on this response option was issued to the Regions on July 6, 1989 (see "Use of Removal Approaches to Speed Up Remedial Action Projects," OSWER Directive #9355.0-25A). These actions are remedial actions. The term "removial," which has been used informally to characterize these actions, should not be used.

The response must meet both remedial and removal program requirements. Time is saved by using removal contractors, and through the use of an abbreviated and less formal design procedure. Remedial funding is provided through a ROD and a state cost-share is provided through a Superfund state contract. For all purposes, including enforcement, these actions are remedial actions. All agreements with PRPs must be embodied in a consent decree. Since this response approach uses large amounts of limited Emergency Response Cleanup Services (ERCS) capacity, it should only be used in unusual emergency or time-critical circumstances. New and streamlined remedial alternatives should obviate the need for this course of action in most cases.

Remedial Actions

The purpose of the remedial action process is to implement remedies that reduce, control, or eliminate risks to human health and the environment. Only those sites included on the NPL are eligible for Fund-financed remedial action (NCP section 300.68). The remedial process generally includes an RI/FS, a proposed plan, a ROD, engineering design, and implementation of the remedial action. All remedial actions must comply with the requirements of §300.68 of the NCP (§§300.430 and 300.435 of the proposed NCP).

A site manager may, in certain situations, choose to use remedial authorities and contracting methods to accelerate response at an NPL site. This may be accomplished through the implementation of an early action operable

unit ROD (for example, to remove drums) and the use of streamlined remedial contracts. Early actions may make it possible to provide earlier protection of public health and the environment, and the actions may also help provide information that may be used to improve the phasing and design of later remedial stages.

Site managers can break actions into distinct portions, which are known as "operable units," to achieve quicker response. An operable unit is "a discrete part of the entire response action that decreases a release, threat of release, or pathway of exposure" (NCP section 300.6; see also proposed NCP Subpart A). Operable units can be designated to accelerate remediation for portions of the site, but all operable units conducted as remedial actions must have RODs. Separate enforcement agreements may be reached for individual operable units.

Expediting Remedial Actions. After signing a ROD, accelerated responses may be implemented under remedial authority. The most obvious method to accelerate remedial action is to initiate construction sooner, i.e., speed up the planning and design process. Once this is achieved, contracting and construction options can be explored to best enhance site remediation. This section briefly describes techniques for expediting remedial construction. (The techniques are covered in greater detail in OSWER Directive #9355.5-02/FS, "Expediting Remedial Construction.") These techniques are applicable to all Superfund projects; however, they are geared toward small (less than $5 million), well defined projects using proven technologies.

Remedial Management Strategy. The remedial management strategy (RMS) is a systematic approach used to identify and establish the preferred contracting strategies to be used in the implementation of a remedial action. The objective is to look at each of the operable units that are part of the remedy described in the ROD and lay out a strategy for construction that meets all of the constraints imposed on the project. The RMS establishes the overall course of action for the project. It is at this point that decisions are made about phasing portions of the project, fast-tracking design and construction, employing limited designs for specific elements, or utilizing alternative procurement methods.

Phasing Remedial Design and Construction. An analysis of remedial design/remedial action (RD/RA) project elements results in the determination that some can be effectively phased or time-sequenced to accelerate them through the design and remediation process. Phasing may achieve an overall fast-track schedule and thereby mitigate the continuing threat of the site to the environment and public safety. Large, complex projects (or operable units) may be broken down into smaller, more manageable response elements. Elements may be worked in unison, but each individual element has its own schedule and moves at its own rate through the remediation process.

Fast-Tracking RD/RA. Fast-tracking might be considered a subset of phasing. Where phasing breaks large complex projects into smaller more manageable units, fast-tracking is a method to accelerate the implementation of those individual elements. There are several techniques that can be used to fast-track RD/RA:

- Expedite RD. Discretionary steps in the RD process may be eliminated or shortened. Site managers must realize, however, that short-cutting the process involves some risk. For example, deciding to use only data collected during the RI/FS for design is one method of expediting. However, the design risks being delayed if the RI/FS data turns out to be marginal or incomplete.

- Use of Removal Authority. As mentioned in the section on Removal Approaches to Remedial Actions, removal contracting methods and remedial funding can be used to implement RD/RA on an accelerated basis.

- Optimize RD. Optimization is the rearrangement of the sequence in which RD elements are performed to enhance the overall schedule. For example, the site access portion of a design could be completed and construction initiated while the rest of the design is still on-going.

- Fast-Track Construction. Many large projects can be divided into separate stages of construction. This is generally accomplished by awarding each stage of work for construction as soon as the design effort on that particular stage of work has been completed. This approach has the advantage that the project will be started and completed sooner than would be possible if it were necessary to wait until all design work had been completed. Another aspect of fast-track construction is ordering items that require long lead-times in advance of the time they will be needed on the job.

Preplaced and Pre-Qualified Contracts. One method to expedite initiation of remedial construction is to use preplaced contracts or pre-qualified contractors. There are several options currently available for use. These methods require approximately 30-60 days to initiate construction activities by eliminating the solicitation and audit requirements of site-specific contracts, thus reducing the time from design completion to construction initiation.

The U.S. Army Corps of Engineers (USACE) has developed methods to expedite the initiation of remedial action at Superfund sites by implementing two innovative contracting strategies: Preplaced Remedial Action (PRA) and Rapid Response (RR) contracts. Both may be used for projects when delaying the remedial action for normal procurement actions may result in detrimental effects on human health or the environment. PRA contracts are structured to implement full-scale remedial actions. RR contracts are for demolition actions, closures, point source contamination control, and site stabilization. They are limited to $2 million per delivery order and may be used for projects where it is necessary to abate, stabilize, mitigate, or eliminate hazardous or contaminated materials or structures.

The Pre-qualified Offerors Procurement Strategy (PQOPS), when completely in place, will provide a list of prequalified contractors that have the capability of performing a specified technology (i.e., incineration, fixation). All contractors on the list will have been technically evaluated and deemed

qualified to perform the specified work. However, they are limited to providing the equipment for a specific technology and do not include broad response support (e.g., site access, excavation, site closure) to fully implement the remedy. The transportable incineration system (TIS) PQOP is in place and the fixation/solidification system (FSS) PQOP will be in place during FY 90.

3.0 WHAT ARE THE ENFORCEMENT ASPECTS OF ACCELERATED RESPONSE?

The Superfund Management Review placed great emphasis on the prompt use of enforcement authority at NPL sites. At sites where there is accelerated response, enforcement and program staff must anticipate each other's needs. Good communications are essential. For example, those evaluating a NPL site, who discover the probable need for accelerated action, need to contact enforcement personnel promptly so that this change can be incorporated into the enforcement strategy for the site. Conversely, enforcement staff must appreciate how delays in performing enforcement activities may affect timing of site response.

Site managers must take advantage of enforcement authorities whenever possible. The enforcement authorities that are available to EPA include strong liability provisions, administrative order authority, judicial enforcement authority, and the authority and funding to take direct action to clean up sites and subsequently recover costs. When developing an accelerated response action, the following enforcement activities should be taken into account:

Enforcement Strategy

Enforcement personnel should take a site-specific approach when developing enforcement strategy. The approach should generally cover the items discussed here (e.g., PRP search, notice to PRPs and States). If enforcement authority is not used, site managers must document why.

PRP Search

If the site is on the NPL, an expedited PRP search can be conducted by focusing on owners and operators that are known and generators that are readily identifiable. PRP searches are discussed in detail in the "Enforcement Project Management Handbook," OSWER Directive #9837.2 (July 1989); see also the "PRP Search Manual," OSWER Directive #9834.3-1A and the "PRP Search Supplemental Guidance for Sites in the Remedial Program," OSWER Directive #9834.3-2A.

Notice to PRPs

Where possible, it is usually advantageous to notify PRPs of their potential liability before transmitting to the PRPs a draft administrative order on consent. Moreover, except for emergencies, PRPs should be notified prior to issuance of a unilateral administrative order. If PRPs have not been notified, a notice letter should be issued. For additional information on enforcement activities, see Section 6.0, Bibliography, for a listing of applicable OSWER Directives.

Notification of the State

Prior to issuing an administrative order, EPA must notify the State. In situations where there is little time available before initiation of site activity, the State may be notified by telephone, followed by written confirmation.

Administrative Order on Consent (AOC)

If the response is an accelerated removal action and PRPs are willing to perform the action, the PRPs' conduct of an accelerated response should be pursuant to an AOC (CERCLA §106). If the accelerated response follows a ROD and is a remedial action, PRP conduct of the action should be pursuant to a consent decree (CERCLA §122). Moreover, settlements that include owners must include an agreement for access to the site. If, during negotiations, site conditions dictate the need for immediate response, the site manager should discontinue negotiations and initiate on-site response. Whenever appropriate, a unilateral order should be issued to allow EPA to seek treble damages and/or possibly convince the PRPs to take over the response effort.

Unilateral Administrative Order (AOU)

Generally, when negotiations become protracted or in critical situations (including some emergencies where time allows), EPA policy is to proceed with a CERCLA §106(a) AOU to viable PRPs before Fund activation. There are exceptions, such as: sites where there is an immediate need to respond; where PRP liability is very uncertain; where there are unique technical problems; or where there are problems with the technical capability of the PRP to conduct the removal action.

4.0 WHAT ADDITIONAL FACTORS SHOULD BE CONSIDERED?

4.1 ARARs

The Superfund Amendments and Reauthorization Act of 1986 (SARA) required that on-site remedial actions comply with applicable or relevant and appropriate requirements (ARARs) of other federal and state environmental laws. Although CERCLA only requires compliance with ARARs for remedial actions, the current NCP requires removals to comply with Federal ARARs to the extent practicable. EPA policy under the proposed NCP (§300.415) requires removal actions to comply with State and Federal ARARs to the extent practicable. Until this policy is promulgated by regulation, compliance with State ARARs during removal actions must be justified based upon protectiveness. Factors used in determining whether removal compliance with ARARs is practicable include: (1) the urgency of the situation, and (2) the scope of the removal action to be conducted, which includes consideration of the statutory limits for removals. Off-site actions must always comply with applicable requirements. (For a statement of EPA's off-site policy, see 50 FR 45933, November 5, 1985, as revised November 13, 1986 in OSWER Directive #9834.11.) Remedial actions, including those discussed in the section on p. 5, Removal Approaches

to Remedial Actions, must comply with all ARARs identified in the ROD, unless an ARAR is waived.

Waivers of ARARs (CERCLA section 121(d)(4)) also may be used for removal as well as remedial actions where they apply. See the document "CERCLA Compliance With Other Laws Manual" (OSWER Directive #9234.1-01) for additional information.

4.2 Public Participation

Informed public involvement in the decision-making process is a key element in the Superfund program. The Superfund Management Review identified that the public wants greater and earlier involvement in the process. As a steward of the environment, EPA must be fully responsive to the concerns of the public if it wishes to retain the public's confidence.

Before a ROD can be signed for an early remedial action, a proposed plan must be circulated, and a 30-day public comment period must be held. An opportunity for public hearing must also be provided. The current NCP provides for a 21-day comment period. However, the proposed NCP provides for a minimum of 30 days for public comment. Adequate information on the proposed action and a limited number of alternatives must also be available to the public along with the proposed plan. This information may, however, be presented in any type of document, including but not limited to an RI/FS or a focused feasibility study.

Public participation requirements for removal actions are set forth in the proposed NCP sections 300.415 and 300.820, and the "Superfund Removal Procedures Manual," Chapter III-F.6. Remedial action requirements are set forth in the proposed NCP sections 300.430 and 300.435, and the Community Relations Handbook.

4.3 Alternative Technologies

As noted in the Superfund Management Review, EPA should continue to encourage the employment of alternative technologies to treat hazardous substances, pollutants, or contaminants at Superfund sites. It is important that technologies selected for removal actions at NPL sites be consistent with planned remedial work and contribute to permanent remedies. OSWER Directive #9355.0-26 (February 1989) reaffirms the use of treatment technologies at Superfund sites and summarizes guidance documents and activities that encourage and support the use of innovative treatment technologies.

Also, OSWER Directive #9380.3-01 (July 12, 1989) describes a treatability data base which is being developed by the Office of Research and Development (ORD) to aid in expediting technology selection on a site-specific basis for the removal and remedial programs.

4.4 Post-Removal Site Control (PRSC)

Provisions for PRSC must be made before removal action initiation. PRSC may be a removal or remedial response under the statute. For remedial actions

a state contract or Superfund cooperative agreement must be in place prior to remedial action initiation in order to assure any State operation and maintenance responsibilities. Information and guidelines on PRSC may be found in the proposed NCP section 300.415 and the "Superfund Removal Procedures Manual," Chapter III-H.2.

4.5 Documentation

The various offices responsible for NPL sites in the Regions should work together to ensure that documentation for sites is adequate to support decision-making and, if appropriate, cost recovery. This is very important at every Superfund site, but it will be especially important if a site is selected for accelerated response. The response action must be sufficiently documented in order to fully justify the rationale for the Region's actions; that is, to explain why a certain activity at an NPL site is being conducted on an accelerated basis and to specify the authority under which the response is being conducted. See NCP section 300.69, and "Interim Guidance on Administrative Records for Selection of CERCLA Response Actions," OSWER Directive #9833.3A.

It is EPA's policy to develop decision documents for responses at sites in order to support the decision and remedy selection and to completely document costs to support cost recovery. Documentation of cleanups must also show that human health and the environment have been protected along all possible pathways of exposure. If a removal response cannot provide sufficient documentation to support the eventual deletion of the site from the NPL, then the site may be completed as a remedial action. Every removal action must demonstrate how it will contribute to any long-term remedial action to be taken at the given site.

5.0 HOW MAY SUPERFUND WORK AS "ONE PROGRAM?"

5.1 Promoting Communication

In order to foster the development of Superfund as "one program," EPA must encourage an increased level of cooperation among the various program offices that administer and support Superfund. The Superfund Management Review states that many of the difficulties Superfund has encountered in the past may be traced to the lack of proper communication between programs. We must institute procedures to improve coordination of site activities among the different Superfund program offices, i.e., pre-remedial, remedial, removal, and enforcement, to provide the internal support necessary for implementing Superfund as "one program." It is also important to ensure that EPA coordination with appropriate authorities located outside the Superfund program (e.g., Agency for Toxic Substances and Disease Registry [ATSDR]) takes place in a consistent manner.

Information on sites should be shared freely among programs, and changes in site status likewise should be communicated to all affected offices. For example, the removal staff may be asked by the remedial staff to conduct a removal site evaluation whenever a new site is proposed for inclusion on the

NPL, and enforcement staff may work with pre-remedial staff on identification of PRPs. Pre-remedial reviewers should share with remedial and removal staff any PA/SI or Hazard Ranking System (HRS) information that would indicate a need for early action. It is important for accelerated responses that technical and professional concerns of all four program offices about NPL sites be identified and addressed early in the response process.

5.2 Training

Superfund managers should encourage cross-training for pre-remedial, remedial, enforcement, and removal staff to allow SAMs, RPMs, and OSCs to learn how the entire Superfund response system works. It is important for site personnel to have a working knowledge of all programs. For example, pre-remedial and remedial staff should understand the capabilities of the removal program so that they can help ensure that removal action is taken where appropriate, and removal staff should know what remedial criteria will be considered before sites can be deleted from the NPL. Regional managers should encourage rotational assignments.

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